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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91211285
Party	Defendant Meenaxi Enterprise, Inc.
Correspondence Address	MEENAXI ENTERPRISE INC 2500B HAMILTON BOULEVARD SOUTH PLAINFIELD, NJ 07080 UNITED STATES meenaxius@yahoo.com
Submission	Answer
Filer's Name	JungJin Lee
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Date	08/09/2013
Attachments	AnswerOppositionRealNamkeen.vFINAL.pdf(215815 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

LAXMI SNACKS PVT. LTD.,)	
Opposer,)	Opposition No. 91211285
v.)	Serial No. 85711780
MEENAXI ENTERPRISE, INC.,)	Mark: REAL NAMKEEN & Design
Applicant.)	

ANSWER TO NOTICE OF OPPOSITION

Applicant, MEENAXI ENTERPRISE, INC., a (hereinafter “Applicant”), owner of Federal Trademark Application Serial No. 85711780 for the mark “REAL NAMKEEN,” a design plus words mark, by and through Counsel, JungJin Lee, Esq., for its Answer and Affirmative Defenses to the Notice of Opposition filed June 26, 2013, on behalf of LAXMI SNACKS PVT. LTD., an Indian Corporation (hereinafter “Opposer”), and assigned Opposition No. 91211285, hereby responds, solely for the purpose of this proceeding, to each of the grounds set forth in the Notice of Opposition, as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Notice of Opposition.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Notice of Opposition.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the Notice of Opposition.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Notice of Opposition.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Notice of Opposition.
6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Notice of Opposition.
7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Notice of Opposition.
8. Admit.
9. Applicant admits in part and denies in part. Applicant admits the filing date of its application and denies the allegations of the remainder of the allegations contained in paragraph 9 of the Notice of Opposition.
10. Admit.
11. Admit.
12. Admit.
13. Applicant admits in part and denies in part. Applicant admits the purchasers are likely to mistakenly assume that the goods originated from the same source. Applicant denies the allegation that the purchasers would associate the goods with the Opposer rather than the Applicant.
14. Denied.
15. Denied.
16. Denied.
17. Denied.
18. Denied.
19. Denied.
20. Denied.

21. Denied.

22. Denied.

23. Denied.

Additional and Affirmative Defenses

1. The Notice fails to state a claim upon which relief can be granted.

There may be additional affirmative defenses, and/or counterclaims to Opposer's Notice of Opposition that are currently unknown to the Applicant. Applicant therefore reserves the right to amend this answer and allege additional defenses, and/or counterclaims in the event discovery or other information indicates they are appropriate.

Wherefore, Applicant respectfully requests that the Trademark Trial and Appeal Board deny and dismiss the Opposition in all respects.

Applicant hereby appoints JungJin Lee, member of the State bar of Michigan, at Lee, Lee, & Associates, P.C., 2531 Jackson Road, Suite 234, Ann Arbor, MI 48103, to act as attorney in the matter of the opposition identified above, to prosecute said opposition, to transact all business in the Patent and Trademark Office, and in the United States courts connected with the opposition, to sign its name to all papers which are hereinafter to be filed in connection therewith, and to receive all communications relating to the same.

Respectfully Submitted,
Meenaxi Enterprises, Inc.

By: /JungJin Lee/
JungJin. Lee, Esq.

Attorney for Applicant

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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2013, a true and correct copy of the foregoing Answer to the Notice of Opposition was served upon:

Alexander Lazouski
Lazouski & Associates, LLC
157 Third Avenue, Suite 2C
Westwood, NJ 07675
al@lzlzlawoffice.com

Via First Class Priority Mail
Via Electronic Mail

I further certify that the foregoing paper is being filed electronically via the Electronic System for Trademark Trials and Appeals (ESTTA).

Date: August 9, 2013

/JungJin Lee/
JungJin Lee